

UNITED STATES DISTRICT  
COURT NORTHERN DISTRICT  
OF TEXAS DALLAS DIVISION

ALBERT G. HILL III,

Plaintiff,

v.

WILLIAM SCHILLING, et al.,

Defendants.

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CIVIL ACTION NO. 3:07-CV-02020-L

**FILED UNDER SEAL**

**GRANDCHILDREN’S MOTION OF FOR LEAVE TO FILE THEIR MOTION TO  
ENFORCE FINAL JUDGMENT AND GLOBAL SETTLEMENT AGREEMENT  
AND FOR OTHER RELIEF, BRIEF IN SUPPORT, AND EVIDENTIARY  
APPENDIX IN SUPPORT, UNDER SEAL**

TO THE HONORABLE SAM A. LINDSAY, UNITED STATES DISTRICT JUDGE:

ALBERT G. HILL, IV (“Hill IV”), NANCE HILL (“Nance”), and CAROLINE HILL, a Minor, by and through her next friend, Hill, IV (“Caroline”) (collectively, the “Grandchildren”) hereby file, pursuant to Rule 15 of the Federal Rules of Civil Procedure, Local Rules 7.1(d) and 7.2(c) of the Local Rules of Practice for the Northern District of Texas, this their Motion for Leave to File Motion to Enforce Final Judgment and Global Settlement Agreement and for Other Relief (“Motion”), Brief in Support (“Brief”), and Evidentiary Appendix in Support (“Appendix”), Under Seal, and to Exceed Page Limitations in their Brief, and states the following.

1. The Grandchildren request the Court grant them leave to file their Motion, Brief, and Appendix, under seal, because the Brief, into which the Motion and the Appendix, are incorporated, references and quotes from documents that are filed with this Court under seal. Specifically, the Brief references and contains information from the parties’ Global Settlement and Mutual Release Agreement (ECF #879) and the Court’s Final Judgment (ECF#999). Both the Global Settlement and Mutual Release Agreement and Final Judgment are filed under seal in this

Court, and confidentiality is a material term of both instruments. In fact, neither document is accessible to or visible by the general public on the Court's docket. In addition to reference and quoting from the sealed Global Settlement and Mutual Release Agreement and Final Judgment, the Brief also references other documents that are filed with the Court under seal. Therefore, to preserve the confidential nature of these sealed documents referenced in, and quoted from, in the Brief, The Grandchildren file this Motion for Leave to file their Motion, his Brief, and his Appendix, under seal.

**WHEREFORE**, the Grandchildren request the Court grant them leave to file their *Motion to Enforce Final Judgment and Global Settlement Agreement and for Other Relief*, Brief in Support, and Evidentiary Appendix in Support, Under Seal, and to Exceed Page Limitations in their Brief, and that The Grandchildren be granted general relief.

**Dated December 11, 2020**

Respectfully submitted,

**SPENCER & JOHNSON, PLLC**

By: /s/ R. Kevin Spencer

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**ATTORNEYS FOR THE  
GRANDCHILDREN**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 11<sup>th</sup> day of December, 2020, I electronically submitted the foregoing document with the Clerk of the Court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the Court, which will then send a notification of such filing to all counsel of record for all parties.

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/s/ R. Kevin Spencer

R. Kevin Spencer